

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: D.I. 243, 333

**CERTIFICATION OF COUNSEL REGARDING STIPULATION FOR
RESOLUTION OF MOTION TO COMPEL REJECTION OF EXECUTORY
CONTRACT OR IN THE ALTERNATIVE FOR RELIEF FROM AUTOMATIC STAY
TO TERMINATE AGREEMENT WITH NORTH AMERICA CHAMPIONSHIP
SERIES, LLC UNDER SECTIONS 365 AND 362(d), OF THE BANKRUPTCY CODE**

The undersigned hereby certifies that:

1. On November 11, 2022 and November 14, 2022, each of the above-captioned debtors and debtors in possession (the “Debtors”) commenced a case under chapter 11 of title of 11 of the United States Code (the “Bankruptcy Code”).

2. On December 16, 2022, North America League of Legends Championship Series, LLC (“Riot”) filed its *Motion Compel Rejection of Executory Contract or in the Alternative for Relief from the Automatic Stay to Terminate Agreement under Sections 365 and 362(d) of the Bankruptcy Code* [D.I. 243] (the “Riot Motion”).

3. By the Riot Motion, Riot sought an order compelling the rejection of the Strategic Sponsorship Agreement (the “Riot Agreement”), dated August 1, 2021 by and between Debtor West Realm Shires Services, Inc., d/b/a FTX.US and Riot, pursuant to Bankruptcy Code section

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtor’s claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

365, or, in the alternative, granting relief from the automatic stay for cause under Bankruptcy Code section 362(d)(1) to permit Riot to terminate the Riot Agreement. The deadline for filing objections or responses to the Riot Motion passed as of January 4, 2023, with no objections having been filed.

4. On December 30, 2022, the Debtors filed the *Debtors' First Omnibus Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts Effective as of the Rejection Date* [D.I. 333] (the "Debtors' Motion"). The Debtors' Motion seeks to reject, among others, the Riot Agreement effective as of December 30, 2022. The Debtors' Motion is currently scheduled to be heard on February 8, 2023.

5. The Debtors and Riot have entered into a stipulation (the "Stipulation") consensually resolving the Riot Motion and the Debtors' Motion. Attached hereto as Exhibit A is a proposed order approving the Stipulation (the "Proposed Order"). Attached as Exhibit 1 to the Proposed Order is the Stipulation.

6. Accordingly, Riot respectfully requests entry of the Proposed Order attached hereto as Exhibit A at the Court's earliest convenience.

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Dated: January 11, 2023
Wilmington, Delaware

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